

EPA REGION IX

FACILITY INVESTIGATION REPORT

Company Name: Whittaker Corp. - Bermite Division
Street Address: 22116 West Soledad Canyon Road
City/State/Zip: Saugus, CA 91350
Phone Number: (213) 629-1403 (805) 259-2241
Mailing Address (if different from above):

Same

Facility Representative(s) & Titles:

1. Jim Jisa, Hazardous Waste Coordinator
2. John Peloguin, Corp. Industrial Hygienist
3. Zoyd Luce, Dir., Industrial Relations

EPA Investigator(s):

1. Randy Marcus, Environmental Scientist
2. Daniel Shane, Environmental Protection Specialist

Other Participants/Agencies:

1. None
2. _____
3. _____

Date(s) of Investigation: September 22, 1982

Purpose of Investigation: RCRA - Interim
Status standards inspection of T/S/D
facility

(over)

State Department of Health Services
Hazardous Materials Management Section

~~Fresno, CA 93727~~

~~291-6676~~

INTERIM STATUS INSPECTION CHECKLIST

Company Name: Whittaker Corp. - Bermite Division EPA. I.D.#

Address: Saugus, CA.

County: Los Angeles

Date: 9-22-82

Telephone: (213)-629-1403 /(805)-259-2241

Persons Interviewed:

~~EPA SDHS~~ Inspector: Randy Marcus & Daniel Shane.

I. General Conditions

A. Identification and general responsibilities of operator

1. Has the owner/operator ensured that the operation of the facility will not imperil public health and safety, wildlife, domestic livestock or the environment? ✓
Yes No NA
2. Does the owner/operator allow ~~SDHS~~ ^{EPA} to inspect the facility, ~~take samples~~ and inspect records? ✓
Yes No NA
3. Does the owner/operator maintain qualified personnel and equipment necessary for safe operation of the facility? ✓
Yes No NA
4. Has the owner/operator notified ~~SDHS~~ ^{EPA} of a proposed change of ownership, method of operation or proposed closure of the facility 30 days prior to such an event? ✓
Yes No NA
5. Did the owner/operator report to ~~SDHS~~ ^{EPA/DOHS}, within 24 hours after occurrence, all accidents involving hazardous wastes which resulted in, or could have resulted in, a hazard to public health or safety, wildlife, domestic livestock, or to the environment? ✓
Yes No NA

B. Records

1. Is there a copy of the Interim Status Document at the facility and at the owner/operator's place of business? Yes No NA

II. Special Conditions

Storage of Wastes

1. Is hazardous waste stored at the facility for more than one (1) year without written approval from SDOHS? Yes No NA
2. If hazardous waste is stored at the facility for more than one (1) year, has the owner/operator paid fees to SDOHS in accordance with Art. 8, Ch. 30, Div. 4, Title 22 CAC.? Yes No NA
3. Is hazardous waste stored in a secure enclosure, building, room or fenced area which prevents unauthorized access and in a manner that will prevent spills? Yes No NA
- a. Are warning signs in English/Spanish posted and visible? Yes No NA
4. Is the hazardous waste area constructed of an impervious material and designed to contain spills or surface water runoff? Yes No NA

Storage in Tanks - yes.

1. Does each above ground hazardous waste storage tank have a spill confinement structure capable of holding the entire contents of the tank plus sufficient freeboard? (2' required) Yes No NA
2. Are hazardous waste storage tanks constructed of materials compatible with stored wastes or protected with liners compatible with stored wastes? Yes No NA
3. Prior to use, were hazardous waste storage tanks and their appurtenances certified by a registered California engineer to be structurally sound and of adequate construction for the intended use? Yes No NA

2-5,000 gal.
holding tanks for
red phosphorus
waste.
tanks
continuously-fed,
with level indicators

haz. waste stored less than 60 days in berm
Drum storage - locked gate & rivet (25' hill)

stainless steel.

4. Is each hazardous waste storage tank and storage area marked with NFPA hazard identification placards? Yes ☒ No ☒ NA ☒
Only red phosphorus dissolved in water, which is non-flammable.
5. Are valves on hazardous waste storage tanks locked when the facility is unattended? Yes ☐ No ☐ NA ☒
24 hour guard at facility & rigid security

Storage in Ponds

1. Are any of the following hazardous wastes stored in open storage ponds?
- a. Extremely hazardous wastes as defined in Secs. 66064 and 66685, Title 22, CAC. without a written permit from SDOHS. Yes ☐ No ☒ NA ☐
- b. Flammable wastes as defined in Sec. 66072, Title 22, CAC. Yes ☐ No ☒ NA ☐
- c. Wastes containing volatile, toxic substances in excess of 10 percent by weight. Yes ☐ No ☒ NA ☐
2. Are hazardous sludges, concentrates and residues removed from a storage pond for disposal properly handled, transported and disposed as hazardous waste? Yes ☒ No ☐ NA ☐
Very little are pumping out in summer / Pumping other seasons
3. Are storage ponds provided with physical barriers or other devices to prevent migratory waterfowl from using them? Yes ☐ No ☒ NA ☒
No migratory waterfowl seen in area, according to Jim Jisa.

Storage in Containers

1. Are hazardous waste storage containers in a condition which allows safe transport and handling? Yes ☒ No ☐ NA ☐
2. Are hazardous waste container storage areas widely separated or physical barriers provided to prevent commingling of incompatible wastes if a container was to rupture? Yes ☐ No ☐ NA ☒

Containers stored less than 60 days usually.

3. Are records maintained for hazardous waste containers stored for more than 60 days pursuant to Sec. 66545, Title 22, CAC.? Yes ☒ No ☐ NA ☒
4. Are hazardous waste containers stored for more than 60 days labeled as follows:?
 - a. Composition and physical state of the waste. Yes ☒ No ☐ NA ☐
 - b. Special safety recommendations and for handling. Yes ☐ No ☒ NA ☐
But safety recommendations known by people handling wastes
 - c. Statements calling attention to the particular hazardous properties of the waste. Yes ☒ No ☐ NA ☐
 - d. Amount of waste and name and address of the producer of the waste. Yes ☒ No ☐ NA ☐
 - e. Date of acceptance at the facility. Yes ☒ No ☐ NA ☐
(accum. date)
5. Are empty containers contaminated with hazardous materials stored, handled, processed and disposed of as hazardous waste? Yes ☒ No ☐ NA ☐

Storage of Water Reactive Waste

1. Are water reactive wastes stored in a rain-tight and waterproof area? Yes ☒ No ☐ NA ☐

Transfer of Wastes

1. Are hazardous wastes permanently disposed of at the facility? Yes ☒ No ☐ NA ☐
N-29 propellant is incinerated only in a pit on facility // or phosphorus contaminated waste
2. Are equipment and pipes and lines used to handle, transfer, pump or store hazardous wastes maintained to prevent leaks and spills of hazardous wastes? Yes ☒ No ☐ NA ☐

* Facility has Burn Permit from
Los Angeles County Fire Department;
Generally, no burning from June thru October

Treatment of Wastes

Do not now mix incompatible wastes.

1. If incompatible wastes are mixed for the purposes of treatment, is the mixing process controlled to prevent hazards to health and safety? Yes No NA ✓

Incineration of Waste

Load limit for N2a & red phosphorus opening burning is 500 lbs/burn.

1. Is the facility operated to minimize release of harmful and obnoxious gases? Yes No NA
2. Does the facility comply with all air emission and air quality standards and requirements? Yes No NA ✓

Under Fire Dept emergency status

Disposal by Land Spreading

1. Are any of the following hazardous wastes disposed of by land spreading?
- a. Extremely hazardous wastes defined in Secs. 66064 and 66685, Title 22, CAC. without a written permit from SDOHS. Yes No NA ✓
- b. Flammable wastes. Yes No NA
- c. Wastes containing volatile, toxic or substances in excess of 10 percent by weight. Yes No NA
- d. Corrosive wastes containing total concentrations by weight in excess of 10 percent of any strong mineral acid or alkali. Yes No NA

Disposal by Landfilling

1. Are hazardous wastes buried in areas potentially subject to slides, slippage, erosion or other geologic instabilities? Yes No NA ✓
2. Is hazardous waste covered within 24 hours with six (6) inches of compacted impermeable soil? Yes No NA ✓

- | | | | |
|--|------------|-----------|-----------|
| 3. Does the final cover in a burial area consist of three (3) feet of compacted impermeable soil? | <u>Yes</u> | <u>No</u> | <u>NA</u> |
| 4. After application of the final cover, have sufficient measures such as diversion ditches, rip-rap to prevent erosion or other measures as required by RWQCB been implemented? | <u>Yes</u> | <u>No</u> | <u>NA</u> |
| 5. Are extremely hazardous waste, flammable waste or strong oxidizers applied to the working face of the landfill? | <u>Yes</u> | <u>No</u> | <u>NA</u> |

Disposal in Wells

- | | | | |
|---|------------|-----------|-----------|
| 1. Are the location, construction and use of disposal wells such that the wastes in each well cannot escape and mix with wastes in other wells? | <u>Yes</u> | <u>No</u> | <u>NA</u> |
| 2. Are inactive wells covered with three feet of compacted, impermeable material? | <u>Yes</u> | <u>No</u> | <u>NA</u> |
| 3. Are records of location and wastes in each well maintained? | <u>Yes</u> | <u>No</u> | <u>NA</u> |
| 4. When wells are being drilled, are special precautions taken to prevent damage to burial cells? | <u>Yes</u> | <u>No</u> | <u>NA</u> |

Disposal in Ponds

- | | | | |
|--|------------|-------------|-----------|
| 1. Are any of the following hazardous wastes deposited in open disposal ponds? | | | |
| a. Extremely hazardous wastes as defined in Secs. 66064 and 66685, Title 22, CAC. without a written permit from SDOHS. | <u>Yes</u> | <u>✓ No</u> | <u>NA</u> |
| b. Flammable wastes as defined in Sec. 66072, Title 22, CAC. <i>*Red phosphorus - is non-flammable in pond.</i> | <u>Yes</u> | <u>No</u> | <u>NA</u> |
| c. Wastes containing volatile, toxic substances in excess of 10 percent by weight. | <u>Yes</u> | <u>✓ No</u> | <u>NA</u> |

2. Are hazardous sludges, concentrates and residues removed from a disposal pond for disposal elsewhere properly handled, transported and disposed as hazardous waste? Yes ☒ No ☐ NA ☐
3. Are disposal ponds provided with physical barriers or other devices to prevent migratory waterfowl from using them? Yes ☐ No ☒ NA ☒ *

(may not be applicable) fowl are in this area.

Disposal in Cells

1. Are burial cells located, constructed and used so that wastes in one cell cannot escape and mix with wastes in other cells? Yes ☐ No ☐ NA ☐
2. Does each burial cell have an adequately composed barrier and liner? Yes ☐ No ☐ NA ☐
3. Are all closed burial cells covered with at least three feet of compacted, impermeable material? Yes ☐ No ☐ NA ☐
4. Are records maintained on the location of each burial cell and lists of all wastes disposed in them? Yes ☐ No ☐ NA ☐
5. Has the liner of each burial cell been penetrated or damaged? Yes ☐ No ☐ NA ☐

Recycling

1. Is the mixing of potentially incompatible materials during recovery, neutralization or detoxification conducted under controlled conditions? Yes ☐ No ☐ NA ☒
2. Has the owner/operator submitted a written statement justifying having not recycled a waste the Department has determined recyclable? Yes ☐ No ☐ NA ☒

All recyclable wastes are recycled.

Management of Extremely Hazardous Waste

1. Does the operator handle extremely hazardous waste under an Extremely Hazardous Waste Disposal Permit? Yes ☒ No ☐ NA ☐

Only done once for toluene diisocyanate.

Management of Powdered Waste

1. Is powdered waste containerized or if water reactive is it wetted as a slurry? Yes ☒ No ☐ NA ☐

*magnesium & aluminum powder handled-
Containerized, but not wetted.*

Management of Asbestos Waste

- | | | | |
|--|------------|-----------|-------------|
| 1. Are asbestos wastes received in sealed containers and handled to prevent damage? | <u>Yes</u> | <u>No</u> | <u>NA</u> ✓ |
| 2. Are wetted asbestos wastes allowed to dry? | <u>Yes</u> | <u>No</u> | <u>NA</u> |
| 3. Are dry asbestos wastes wetted thoroughly? | <u>Yes</u> | <u>No</u> | <u>NA</u> |
| 4. Are asbestos wastes covered by six (6) inches of soil or nonhazardous soil waste within 24 hours after receipt? | <u>Yes</u> | <u>No</u> | <u>NA</u> |

Forbidden Hazardous Waste

- | | | | |
|---|--------------|-------------|-----------|
| 1. Are the following wastes handled at the facility? | | | |
| a. Extremely hazardous waste unless approved by permit. | <u>Yes</u> | <u>No</u> ✓ | <u>NA</u> |
| b. Flammable or water reactive waste. - <i>red Al, Mg, & other powdered metals & phosphorus handled - properly</i> | <u>Yes</u> ✓ | <u>No</u> | <u>NA</u> |
| c. Organic solvents or sludges containing volatile toxic substances in excess of 10 percent by weight. - <i>degreasing solvents trichloroethane - recycled.</i> | <u>Yes</u> ✓ | <u>No</u> | <u>NA</u> |
| d. Corrosive wastes containing in excess of 10 percent by weight of any strong mineral acid or alkali. | <u>Yes</u> | <u>No</u> ✓ | <u>NA</u> |
| e. Burning waste. - <i>red phosph & N-29 a propellant.</i> | <u>Yes</u> ✓ | <u>No</u> | <u>NA</u> |
| f. Forbidden and Class A explosives. | <u>Yes</u> ✓ | <u>No</u> | <u>NA</u> |

Management of Incompatible Waste

- | | | | |
|---|--------------|-----------|-------------|
| 1. Are the following incompatible wastes handled separately during handling, storage, and disposal? | | | |
| a. Alkalies and cyanides. | <u>Yes</u> | <u>No</u> | <u>NA</u> ✓ |
| b. Acids. | <u>Yes</u> ✓ | <u>No</u> | <u>NA</u> |

- (TCE)
- c. Toxic wastes, pesticides and flammable waste ☒ Yes ☐ No ☐ NA
- d. Strong oxidizers. ☒ Yes ☐ No ☐ NA

Management of Pesticide Wastes

1. Are empty pesticide containers properly stored, handled, treated and disposed? ☐ Yes ☐ No ☒ NA

Management of PCB Waste

1. Are PCB wastes managed according to Part 761, Title 40 CFR.? ☐ Yes ☐ No ☒ NA

Safety and Emergency Procedures

1. Is non-potable water supply clearly marked in English and Spanish- "Polluted-Not Safe for Human Use"? ☐ Yes ☐ No ☒ NA
No non-potable water.
2. Is the public water supply protected from cross-contamination? ☐ Yes ☐ No ☒ NA
3. Does the private water supply meet drinking water standards? ☐ Yes ☐ No ☒ NA
Well water-industrial wtr. source
* bottled water for drinking
- If not, are faucets and taps clearly marked in English/Spanish? ☐ Yes ☐ No ☒ NA
4. Is the facility perimeter fenced and posted to prevent entry by humans and livestock? ☒ Yes ☐ No ☐ NA
5. If the facility is operated at night is it sufficiently lighted? ☐ Yes ☐ No ☒ NA
Not normally oper. at night.
6. Is the facility perimeter and entry point(s) marked in English/Spanish - "Caution - Hazardous Waste Area - Unauthorized Persons Keep Out"? ☒ Yes ☐ No ☐ NA
at lagoons & storage sites
7. Does the facility have adequate telephone or radio communications to be used in the event of an emergency? ☒ Yes ☐ No ☐ NA
& emergency radios & direct dial to fire dept. phones.
8. Are safety showers provided and in workable condition? ☒ Yes ☐ No ☐ NA

9. Are eyewashes provided and in workable condition? ☒ Yes ☐ No ☐ NA
10. Are first aid kits provided, maintained and available for immediate use? ☒ Yes ☐ No ☐ NA
11. Is the following NIOSH approved equipment provided in adequate numbers?
- a. Protective headgear and face masks. ☒ Yes ☐ No ☐ NA
- b. Chemically resistant apparel and gloves. ☒ Yes ☐ No ☐ NA
- c. SCBA's and respirators with approved cartridges. ☒ Yes ☐ No ☐ NA
12. Are emergency alarms or other communication devices capable of summoning emergency assistance available? ☒ Yes ☐ No ☐ NA
high level monitors in both lagoons.
13. Does the facility have fire fighting equipment available to fight Class A and B fires? ☒ Yes ☐ No ☐ NA

Record Keeping and Reporting (on site and off site Disposal Facilities only)

No haz. wastes received for on-site disposal.

1. Has the owner/operator done the following:
- a. Complete manifests for all hazardous waste received. ☒ Yes ☐ No ☐ NA
- b. Submit manifests to SDOHS on a monthly basis. ☐ Yes ☐ No ☒ NA

Safety, Equipment, and Emergency Response

1. Identification number and notices:

a. Does owner/operator have an EPA Identification Number? Number CAD064573108

☒ Yes

☐ No

2. Notices

a. Does owner/operator receive hazardous waste from a foreign source?

☐ Yes

☒ No

b. If so, was DOHS notified at least four weeks in advance?

☐ Yes

☒ No

N.A.

✓ 3. Waste Analysis

a. Does owner/operator analyze waste prior to treating, storing or disposing of the waste? (Existing published or documented data may be substituted for analyses).

☒ Yes

☐ No

Analysis or ~~data~~ Material Safety Data Sheets for all haz. wastes.

b. Does owner/operator have a written Waste Analysis Plan?

☒ Yes

☒ No

N.A.

(1) Is plan DOHS approved

☒ Yes

☒ No

(2) Is plan kept at site, (verification clause)

☐ Yes

☐ No

(3) Does plan specify parameters and a rationale for selecting these parameters?

☐ Yes

☐ No

(4) Does plan specify test methods used?

☐ Yes

☐ No

(5) Does plan specify sampling methods to be used? (Sampling method should be able to produce a representative sample).

☐ Yes

☐ No

(6) Does plan specify the frequency with which the initial analysis will be reviewed or repeated? (Analyses should be completed when process changes or waste composition changes).

☐ Yes

☐ No

4. Security

- a. Does owner/operator have means to prevent unauthorized entry of persons or livestock onto the active portion of the facility ☒ Yes ☐ No
If yes, what means Chain-link fence

(24 hour surveillance or an artificial barrier such as fence or an attendant, T.V. monitors, locked entrance etc. are acceptable.
at night.)

- b. Is a sign visible from 25 feet posted at each entrance to the facility? Sign legend in English and Spanish reading "Caution - Hazardous Waste Area - Unauthorized Persons Keep Out"? ☒ Yes ☐ No

Signs readily visible at lagoons and haz. waste entr. storage area.

Inspections

1. Does the owner/operator inspect the facility at a reasonable frequency to detect malfunctions, deteriorations and errors which may threaten the environment and human health? ☒ Yes ☐ No
Inspected Daily / Logged weekly.
2. Does the owner/operator have a written inspection schedule for inspection of monitoring equipment, safety and emergency equipment, operational devices and dikes and sumps etc. ☒ Yes ☐ No
3. Has the schedule been approved by SDOHS? ☒ Yes ☐ No
4. Is the schedule kept at the facility? ☒ Yes ☐ No
5. Does the schedule identify the problem areas to be checked? ☒ Yes ☐ No
6. Is the frequency of inspection such that deterioration or malfunction which may threaten the environment or human health between inspections? ☒ Yes ☐ No
7. Are observations maintained in an inspection log or summary showing dates and times of inspection, name of inspector, observations recorded and date and nature of repair? ☒ Yes ☐ No

Personnel Training

1. Does the owner/operator provide classroom or on the job training to facility personnel? ☒ Yes ☐ No
Both classroom & on-the-job training provided by Bermite.

2. Are instructors trained in hazardous waste management procedures? ☒ Yes ☐ No
3. Does training include: *weekly training program for safety information*
- a. Emergency response including use of emergency equipment and systems? ☒ Yes ☐ No
- b. Has current personnel completed training by May 19, 1981 and new employees six (6) months after date of employment? *Safety training session* ☒ Yes ☐ No
- c. Is an annual training review conducted? *Weekly review.* ☒ Yes ☐ No
- d. Are training records maintained? ☒ Yes ☐ No
- e. Are training records maintained for 3 years on former employees? ☒ Yes ☐ No
- f. Does the owner/operation maintain following documents and records at the facility:
- (1) Job title for each position at the facility related to HWM. ☒ Yes ☐ No
- (2) Written job description for each position listed above. ☒ Yes ☒ No
- (3) Written records of the type and amount of introductory and continuing training ☐ Yes ☒ No

Ignitable, Reactive and Incompatible Wastes

1. Does owner/operator take precautions to prevent accidental ignition or reaction of ignitable or reactive waste? ☒ Yes ☐ No
2. Are "No Smoking" signs displayed in hazardous areas? ☒ Yes ☐ No
If yes, are these signs located conspicuously? ☒ Yes ☐ No
3. Are these wastes treated, stored, or disposed to prevent:
- a. Generation of heat or pressure, fire or explosion or violent reaction. ☒ Yes ☐ No
- b. Production of toxic mists, fumes, dusts or gases. ☐ Yes ☐ No :

Not Applicable

- | | | |
|---|-------------------------------------|--------------------------|
| c. Production of flammable fumes or gases. | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |
| d. Damage to structure of facility | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |
| e. A threat to human health or the environment. | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |

Facility Maintenance and Operation

- | | | |
|--|-------------------------------------|--------------------------|
| 1. Is facility maintained to minimize possibility of fire, explosion and release of hazardous waste to the air, soil or surface water? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |

Equipment Testing and Maintenance

- | | | |
|--|-------------------------------------|--------------------------|
| 1. Does facility test and maintain communication systems, alarm systems, fire protection equipment, spill control equipment and decontamination equipment? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |

Aisle Space

- | | | |
|--|-------------------------------------|--------------------------|
| 1. Is sufficient aisle space maintained to allow unobstructed movement of equipment and personnel? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |

Arrangements with Local Authorities

- | | | |
|---|-------------------------------------|--------------------------|
| 1. Have arrangements been made with police, fire departments and emergency response teams? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |
| 2. Has facility provided local authorities with a facility layout, types of wastes handled, and other information they would need to respond? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |
| 3. If local authorities have declined to enter into such arrangements, is refusal documented? | Not applicable | <input type="checkbox"/> |
| | Yes | No |

Contingency Plan

- | | | |
|--|-------------------------------------|--------------------------|
| 1. Does facility have an SDOHS approved contingency plan? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |
| *Cont. Plan submitted in 1-5-82 to DOHS, for review/approval - now pending approval. | | |
| 2. Does the contingency plan describe personnel responsibilities and action to be taken in the event of fire, explosion or release of hazardous waste? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | Yes | No |

3. Does the plan describe agreements with police, fire departments, hospitals, contractors and State and local emergency response teams? ☒ Yes ☐ No
4. Does the plan list names, addresses and phone numbers for all emergency coordinators? ☒ Yes ☐ No
5. Does the plan list all emergency equipment available at the facility along with its location and capabilities? ☐ Yes ☒ No
Amendment to plan, correcting this deficiency, will be sent to EPA, DOHS.
6. Does the plan include an evacuation plan including signals and alternate routes? ☒ Yes ☐ No
7. Is a copy of the plan at the facility? ☒ Yes ☐ No
8. Has the plan been submitted to ^{yes} DOHS and local authorities such as police, fire, hospitals, etc. ☒ Yes ☒ No
** Not submitted to Fire Dept. or Police Dept. or hospitals. DOHS yes*
9. Is the plan reviewed and amended when:
 - a. Applicable regulations are revised ☒
 - b. The plan fails in our emergency ☒
 - c. The list of emergency coordinators changes ☒
 - d. The list of emergency equipment changes ☒
10. Has an emergency coordinator been designated? ☒ Yes ☐ No
11. Is the emergency coordinator thoroughly familiar with the plan and emergency procedures (as outlined in the ISD). ☒ Yes ☐ No
12. Does the emergency coordinator thoroughly understand his responsibilities in an emergency? ☒ Yes ☐ No
13. Is there a Spill Prevention Control and Countermeasure plan? ☐ Yes ☒ No
Not applicable.

Record Keeping

Operating Record

1. Does the owner/operator maintain a written operating record at the facility? ☒ Yes ☐ No

2. Does the operating record contain:

- a. A description and quantity of each hazardous waste received, method and date of TSD. Computer printout of this info. ☒ Yes ☐ No
- b. Location of each waste and quantity at each location with cross-referencing to specific manifest document numbers. Not ready for shipment, so no manifest no. ☒ Yes ☐ No
- c. Waste analyses and trial tests. Known wastes - analysis not needed. ☐ Yes ☐ No Not applicable
- d. Reports and details of incidents that required implementing the contingency plan. (in contingency plan) ☒ Yes ☐ No
- e. Inspection results and records retained 3 years. Back to Nov. 1980. ☒ Yes ☐ No
- f. Monitoring, testing and analytical data where required. ☒ Yes ☐ No
- g. Closure cost estimates. ☒ Yes ☐ No

Availability, Retention and Disposition of Records

1. Were all records available for inspection? ☒ Yes ☐ No

Annual Report

1. Has the owner/operator prepared an annual report? (1981) ☒ Yes ☐ No

Additional Reports

1. Were the following additional reports available for inspection?: ☒ Yes ☐ No ☐ NA
- a. Releases, fire and explosion. ☒ Yes ☐ No
- b. Groundwater contamination and monitoring data - None ☒ Yes ☐ No no grndwtr. contain
*Grndwtr. consultant will review grndwtr monitoring & analysis - Report on ground water monitoring will be issued
- c. Facility closure in near future. ☐ Yes ☐ No
Not applicable - operating facility.

*International Engineering Company, San Francisco -
Walt Bill, contact engineer.

Closure

1. Does the owner/operator have a closure plan?

☒ Yes ☐ No

If yes, is this plan approved by RWQCB? - submitted to DOHS

☐ Yes ☒ No

Is this plan kept at the facility?

☒ Yes ☐ No

Is this plan available for inspection?

☒ Yes ☐ No

Closure Plan is adequate

Financial Responsibility

1. Have cost estimates for facility closure been prepared?

☒ Yes ☐ No

If yes are cost estimates maintained at the facility?

☒ Yes ☐ No

2. Are these estimates available for inspection?

☒ Yes ☐ No

3. Have cost estimates been updated for inflation?

☒ Yes ☐ No

Off Site Facility - Not applicable,

1. Waste Analysis

- a. Is there an approved waste analysis plan which specifies the analyses generators must supply?

☐ Yes ☐ No

- b. Does the waste analysis plan specify the procedures used to identify waste on the manifest (at the facility) and the sampling method to be used?

☐ Yes ☐ No

- c. When receiving particular wastes for the first time, is a detailed chemical/physical analysis obtained?

☐ Yes ☐ No

Is the analysis updated when necessary?

☐ Yes ☐ No

2. Use of Manifest

- a. Does owner/operator require a manifest before waste is accepted?

☐ Yes ☐ No

- b. Are wastes inspected to ensure the delivered wastes match the description on the manifest?

☐ Yes ☐ No

- ✓ c. Are manifests checked for completeness?

☒ Yes ☐ No

Checked by Jim Jisa

for completeness, before accompanying haz. waste shipments.

- d. Is manifest signed and dated to certify that waste covered by manifest was received? ☒ Yes ☐ No
- e. Are manifests retained for at least three (3) years? ☒ Yes ☐ No
- f. Are legible copies of completed manifests provided to SDOHS on monthly basis? - by disposal facility ☒ Yes ☐ No
- g. Are manifests reconciled with the delivery and discrepancies reported? ☐ Yes ☐ No N.A.

Manifest Discrepancies - not applicable (generator) - generator only.

1. Does owner/operator note any significant discrepancies in the manifest? (See ISD for definition of significant discrepancy). ☐ Yes ☐ No
2. Does owner/operator try to reconcile the discrepancies with generator or transporter before accepting the waste? ☐ Yes ☐ No
3. If a load is returned because manifest discrepancy was not resolved, does the owner/operator notify SDOHS immediately? ☐ Yes ☐ No
4. If a load is accepted with resolved manifest discrepancy, does owner/operator note on SDOHS manifest copy how the discrepancy was resolved? ☐ Yes ☐ No

Annual Report - Not Applicable.

1. Has the owner/operator prepared an annual report? (Refer to ISD regarding essentials of report). ☐ Yes ☐ No

Unmanifested Waste Report - not applicable

1. Has the facility received unmanifested waste? ☐ Yes ☐ No
2. If so, was a report received within 15 days? ☐ Yes ☐ No ☐ NA

Groundwater Monitoring (Effective November 19, 1981) *

- | | | |
|---|------------|-------------|
| 1. Effective November 19, 1981 has the owner/operator implemented a groundwater monitoring program? | <u>Yes</u> | <u>No</u> ✓ |
| 2. Is the plan approved by the CRWQCB? None yet. | <u>Yes</u> | <u>No</u> |
| 3. If not, has a waiver been obtained from CRWQCB? | <u>Yes</u> | <u>No</u> ✓ |

Landfills (Effective November 19, 1981) - Not applicable

- | | | |
|---|------------|-----------|
| 1. Does the operating record include: | | |
| a. Map showing the exact location and dimension of each cell. | <u>Yes</u> | <u>No</u> |
| b. The contents of each cell and the approximate location of each hazardous waste in each cell. | <u>Yes</u> | <u>No</u> |
| 2. Does the closure plan specify the function and design of the cover? | <u>Yes</u> | <u>No</u> |
| 3. Does the closure plan address control of pollution migration (via groundwater, surface water and air), surface water infiltration and erosion? | <u>Yes</u> | <u>No</u> |
| 4. Does the closure plan address the following: | | |
| a. Type and amount of waste in the landfill. | <u>Yes</u> | <u>No</u> |
| b. Mobility and migration of waste. | <u>Yes</u> | <u>No</u> |
| c. Site location, topography and surrounding land use with respect to pollution migration. | <u>Yes</u> | <u>No</u> |
| d. Climate. | <u>Yes</u> | <u>No</u> |

* Facility will request exemption from groundwater monitoring requirement in the near future, supported by Geohydrology Report from their consulting engineer (International Engineering Co., San Francisco).

Basis for groundwater monitoring waiver is their new hypolon liner and leak detection system (perforated pipe in sand layer under impoundment, connected to a concrete

e. Characteristics of the cover.

Yes No

f. Geology, soil profile and hydrology.

Yes No

5. Does post-closure plan appear complete?

Yes No

6. Is the landfill liner adequate to receive liquid waste?

Yes No

7. Are liquid wastes treated or stabilized?

Yes No

8. Is the landfill receiving liquid wastes after November 19, 1981?

Yes No

9. Are empty containers crushed prior to burial?

Yes No

10. Are ignitable and reactive wastes buried without inactivation?

Yes No

11. Are incompatible wastes placed in the same cell?

Yes No

Tanks

1. Are hazardous wastes stored which could cause rupture, leaking or corrosion?

Yes No

2. Do uncovered tanks have a 2 foot freeboard, dikes or containment structures?

Yes No

3. If the tank is continuously fed, is there a waste feed cutoff?

Yes No

*Not continuously fed, except when operating.
When operating, there is a cutoff.*

Not applicable

4. Are waste analyses completed when a tank is used to store a substantially different waste than before?

Yes

No

Not applicable

5. Are tanks inspected as follows:

a. Discharge control daily.

Yes

No

b. Monitoring equipment daily.

Yes

No

c. Waste level daily.

Yes

No

d. Construction materials weekly.

Yes

No

e. Containment construction weekly.

Yes

No

6. Are ignitable, reactive or incompatible waste stored in same tanks?

Yes

No

7. Does owner/operator have closure plan for tanks.

Yes

No

Land Treatment

- Not applicable

1. Can wastes applied be biodegraded?

Yes

No

2. Have run-off and run-on diversion and collection areas been constructed? (Effective November 19, 1981)

Yes

No

3. Before application are wastes analyzed to determine?:

a. Concentrations of toxic or hazardous components.

Yes

No

b. Concentrations of As, Cd, Pb, Hg.

Yes

No

4. Has owner/operator filed an unsaturated zone monitoring plan with EWQCB?
(Refer to ISD for essentials of unsaturated zone monitoring plan).

Yes

No

7. Are incompatible wastes commingled or placed in unwashed treatment equipment?

Yes No

Incineration and other Thermal Treatment

- None - except burning of N-298 phosphorus contam. waste

1. Is the incinerator brought to steady state before addition of the waste?
2. Is any waste not previously incinerated analyzed for heating value, halogen and sulfur content, and for lead and mercury?

Yes No

Yes No

3. Are monitoring inspections conducted on:

a. Instrumentation every 15 minutes.

Yes No

b. Visual stack emissions hourly.

Yes No

c. Entire incinerator and equipment daily.

Yes No

4. Is all waste and residue removed from the incinerator at closure?

Yes No

5. Is open burning and detonation conducted?

Yes No

only N-298 & no detonation of haz. wastes. phos. waste.

Surface Impoundments

1. Are at least two (2) feet of freeboard maintained?

Yes No

2. Do earthen dikes have a protective cover?

Yes No

3. Is waste analyzed when treating a waste substantially different from waste previously treated in that impoundment?

Yes No

Always Same waste.

Not applicable.

4. Is freeboard inspected daily?

Yes No

high level monitors in lagoons.

5. Are surface impoundments, dikes and vegetation inspected weekly? *Insp. daily; logged weekly.* ☒ Yes ☐ No
6. Are reactive and ignitable wastes inactivated before storage impounding? *Only impound red phosphorus & lead salts. - rendered non-reactive & non-ignitable by mixing with water.* ☒ Yes ☒ No
7. Are incompatible wastes placed in same impoundment? ☐ Yes ☒ No

Waste Piles

- None

1. Are waste piles covered or protected from wind? ☐ Yes ☐ No
2. Is incoming waste analyzed before being added to the pile? ☐ Yes ☐ No
3. If leachate or run-off is hazardous, is waste placed on an impermeable base and run-on diverted and run-off collected? (Effective November 19, 1981) ☐ Yes ☐ No
4. Is the pile protected from run-on? (Effective November 19, 1981) ☐ Yes ☐ No
5. Are liquids or wastes containing liquids placed on the pile? ☐ Yes ☐ No
6. Is ignitable or reactive waste added to the pile unless inactive or managed to protect it from any material or conditions which may cause it to ignite or react? ☐ Yes ☐ No
7. Are incompatible wastes placed in the same pile? ☐ Yes ☐ No
8. Are incompatible waste piles physically separated? ☐ Yes ☐ No
9. Are incompatible waste areas decontaminated prior to addition of new waste? ☐ Yes ☐ No

Storage of Containers

1. Are containers compatible with stored wastes in them? ☒ Yes ☐ No
2. Are all containers closed? ☒ Yes ☐ No
3. Are containers properly handled to prevent rupture or leakage? ☒ Yes ☐ No
4. Are container storage areas inspected for leaks, corrosion or other deterioration on a weekly basis? ☒ Yes ☐ No
5. Are containers used to store ignitable or reactive waste stored at least 50 feet from the facility's property line? ☒ Yes ☐ No
6. Are incompatible wastes stored in same containers? ☐ Yes ☒ No
7. Is hazardous waste added to unwashed containers previously used to store incompatible waste? ☐ Yes ☒ No
8. Are incompatible waste containers physically separated from other incompatible waste areas? ☒ Yes ☐ No

inspected daily
& logged weekly